

Heller, Donald

From: Ramanauskas, Peter
Sent: Friday, June 01, 2018 8:09 AM
To: Heller, Donald
Subject: RE: Draft response to Bodycote

Thanks, Don. Here are my thoughts.

"We believe we can agree on an alternative and propose the following: for each of the 10 borings, composite within each 5 foot interval (e.g. collect a 5-point composite with aliquots collected every foot) down to 40 feet. Multiply the result of the 5-ft/point composite by 5 for comparison to the screening criterion [is it 1 ppm?]. If the criterion is exceeded, analyze the individual aliquots to determine where the PCB concentrations are elevated.

If the objective is to use these data in lieu of collecting confirmatory samples should excavation be the chosen remedy, there need to be "clean" sampling points shown at the limits of the excavation."

Let me know if you'd like to discuss.
Peter

From: Heller, Donald
Sent: Friday, June 01, 2018 7:56 AM
To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: Draft response to Bodycote

Please let me know your thoughts.

Dear Mr. Mabbett:

I've received the email you have sent yesterday, and I understand your concerns about the increased costs that would be incurred by a more thorough sampling plan for PCB delineation than what was originally proposed.

EPA will accept your proposal for analyzing composite samples from 5-foot depth intervals of the direct-push cores, provided that the analytical result is multiplied by the number of feet of the depth interval, before it is compared with screening criteria to be used for the exercise.

For example: if the composite analytical result for a 5-foot interval is 3 mg/kg PCBs, a value of 15 mg/kg will be used in the calculations for screening purposes.

Please contact me if you have questions.